## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

V.

SIMON SUAZO, DIMITRIT VALLEJO LARA, alias Wilkin Beltre Mendez, Defendants.

INDICTMENT

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The Grand Jury charges that:

U.S. DISTRICT COURT DISTRICT OF RHODE ISLAND

## **COUNT I**

From a time unknown up to and including on or about December 4, 2009, in the District of Rhode Island, the defendants, SIMON SUAZO, DIMITRIT VALLEJO LARA, alias Wilkin Beltre Mendez, and others known and unknown to the Grand Jury, did knowingly, intentionally, and wilfully combine, conspire, confederate, and agree to knowingly and intentionally distribute, and to possess with intent to distribute, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B),

in violation of 21 U.S.C. § 846.

## **COUNT II**

On or about December 4, 2009, in the District of Rhode Island, the defendants, SIMON SUAZO and DIMITRIT VALLEJO LARA alias Wilkin Beltre Mendez, did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance

containing a detectable amount of heroin, a Schedule I Controlled Substance,

in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B) and 18 U.S.C. § 2.

A TRUE BILL:

REDACTED

PETER F. NERONHA United States Attorney

ADI GOLDSTEIN

Assistan U.S. Attorney

STEPHEN G. DAMBRUCH

Assistant U.S. Attorney Criminal Division Chief

Dated: December 16, 200 9